EXHIBIT 151
REDACTED

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Page 1

1   IN THE UNITED STATES DISTRICT COURT

2   EASTERN DISTRICT OF TEXAS

3   SHERMAN DIVISION

4

5   THE STATE OF TEXAS, ET AL,

6   Plaintiffs,

7   vs.   CIVIL NO. 4:20-CV-957-SDJ

8   GOOGLE LLC,

9   Defendants.

10   _____/

11

12

13   HIGHLY CONFIDENTIAL

14   VIDEOTAPED DEPOSITION of NIRMAL JAYARAM, PhD

15   Redwood City, California

16   April 26, 2024

17   9:24 a.m.

18

19

20

21   Job No. MDLG6661144

22

23   Stenographically reported by:

24   JENNY L. GRIFFIN, RMR, CSR, CRR, CCRR, CRC

25   CSR No. 3969

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Page 115

1   like purchasing something from the advertiser page,

2   or a different type of action which the advertiser

3   recognizes as a conversion. So that action needs to

4   happen.

5   Q.   What are the benefits to publishers of

6   Bernanke?

7   A.   Bernanke is a buy-side algorithm meant to

8   maximize advertiser value subject to margin

9   constraint. So that's the primary goal.

10   We do think that Bernanke also benefited

11   publishers because we're building a better AdWords

12   product. Our hope is more AdWords advertisers would

13   use it. And more -- that means more revenue that

14   can also flow to publishers.

15   Q.   Did Bernanke result in publishers earning

16   more revenue?

17   A.   In -- I cannot answer the question as

18   phrased, because what happens to publishers -- I

19   don't have any visibility into it. Publishers earn

20   revenue from a lot of different sources, and I only

21   have this ability into the AdWords component of it.

22

Page 291

1   BY MR. HILLEGAS:

2   Q.   There were some publishers ██████████

       ███████████████████████████████; right?

4   MR. BITTON: Objection to form.

5   THE WITNESS: ██████████████████

       ███

       ████████████████████

8   And our hope always is that by building a

9   good advertiser product, more budgets come to

10   AdWords, and publishers benefit from these launches

11   too.

12   BY MR. HILLEGAS:

13   Q.   Do you know what percentage the biggest --

14   the publishers that lost the most lost by?

15   MR. BITTON: Objection to form.

16   THE WITNESS: Again, we cannot actually

17   quantify whether a publisher lost because of a

18   particular launch. Assuming, again, that the

19   budgets went up because of good advertiser launches

20   for AdWords, publishers would also benefit from

21   those increased budgets.

22   BY MR. HILLEGAS:

23   Q.   Some publishers may have seen ██████████

       ████████████████; right?

25   MR. BITTON: Objection to form.

Page 359

1   ---oOo---

2

3   I, JENNY L. GRIFFIN, hereby certify:

4   That I am a certified shorthand reporter in and

5   for the County of Alameda, State of California;

6   Prior to being examined, NIRMAL JAYARAM, PhD,

7   the witness named in the foregoing deposition, was by

8   me duly sworn to testify to the truth, the whole

9   truth, and nothing but the truth; that said

10   deposition was taken pursuant to notice at the time

11   and place therein set forth, and was taken down by me

12   in stenotype and thereafter transcribed by means of

13   computer-aided transcription, and that said

14   deposition is a true record of the testimony given by

15   the witness.

16   I further certify that I am neither counsel for

17   nor related in any way to any party to said action,

18   nor otherwise interested in the outcome thereof.

19   In witness whereof, I have hereunto subscribed

20   my name April 29, 2024.

21

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23

24   JENNY L. GRIFFIN, CSR #3969

25   Certified Shorthand Reporter

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Page 360

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 1    JUSTINA K. SESSIONS, ESQ

 2    Justina.sessions@freshfields.com

 3                        April 29, 2024

 4    RE: The State Of Texas, Et Al. v. Google LLC

 5         4/26/24, Nirmal Jayaram(#6661144)

 6         The above-referenced transcript is available for

 7    review.

 8         Within the applicable timeframe, the witness should

 9    read the testimony to verify its accuracy. If there are

10    any changes, the witness should note those with the

11    reason, on the attached Errata Sheet.

12         The witness should sign the Acknowledgment of

13    Deponent and Errata and return to the deposing attorney.

14    Copies should be sent to all counsel, and to Veritext at

15    cs-golkow@veritext.com

16

17     Return completed errata within 30 days from

18      receipt of testimony.

19        If the witness fails to do so within the time

20     allotted, the transcript may be used as if signed.

21

22                   Yours,

23                   Veritext Legal Solutions

24

25
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Page 361

1   DECLARATION UNDER PENALTY OF PERJURY

2   Case Name: The State Of Texas, et al. v. Google LLC

3   Name of Witness: NIRMAL JAYARAM, PhD

4   Date of Deposition: April 26, 2024

5   Job No.: 6661144

6

7   I, NIRMAL JAYARAM, PhD, hereby certify

8   under penalty of perjury under the laws of the State

9   of California that the foregoing is true and correct.

10   Executed this _____ day of

11   _____, 2024, at _____.

12

13

14   _____

15

16   NIRMAL JAYARAM, PhD

17

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ERRATA SHEET FOR THE TRANSCRIPT OF:

Case Name: *The State of Texas, et al* v. Google LLC, Case No. 4:20-CV-00957 (E.D.T.X.)

Deposition Date: April 26, 2024

Deponent: Nirmal Jayaram

CORRECTIONS

Page	Line	Change	Reason
24	9	Change "Ad Exchanges" to "ad exchanges"	Transcription error
24	12	Change "Ad Exchanges" to "ad exchanges"	Transcription error
24	17	Change "Ad Exchanges" to "ad exchanges"	Transcription error
24	19	Change "Ad Exchanges" to "ad exchanges"	Transcription error
26	16	Change "Ad Exchanges" to "ad exchanges"	Transcription error
26	19	Change "Ad Exchanges" to "ad exchanges"	Transcription error
26	22	Change "Ad Exchanges" to "ad exchanges"	Transcription error
26	25	Change "Ad Exchanges" to "ad exchanges"	Transcription error
41	5-6	Change "cost per requisition" to "cost per acquisition"	Transcription error
63	10	██████████████████	Transcription error
63	12	██████████████████	Transcription error
63	14	██████████████████	Transcription error
63	16	██████████████████	Transcription error
63	19	██████████████████	Transcription error
63	24	██████████████████	Transcription error
64	2	██████████████	Transcription error
64	10	██████████████	Transcription error
64	4	██████████████	Transcription error
64	14	██████████████	Transcription error
65	4	██████████████████	Transcription error
68	6	████████████████████	Transcription error

68	10	███████████████████	Transcription error
120	8	Change "Ad Exchanges" to "ad exchanges"	Transcription error
120	12	Change "Ad Exchanges" to "ad exchanges"	Transcription error
121	11	Change "Ad Exchanges" to "ad exchanges"	Transcription error
122	24	Change "Ad Exchange" to "ad exchange"	Transcription error
134	22	Change "Ad Exchanges" to "ad exchanges"	Transcription error
137	6	Change "dictates the good revenues" to "dictates the revenues"	Transcription error
263	23	Change "if publishers said multiple floors" to "if publishers set multiple floors"	Transcription error
343	15	████████████████	Transcription error
343	21	██████████████████	Transcription error
344	2	████████████████	Transcription error
344	19	███████████████	Transcription error
346	1	███████████████	Transcription error
346	3	███████████████	Transcription error

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefor.

Date: _____5/28/2024_____   Signature: _____*Nirmal Jayaram*_____

DocuSigned by:

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